

FILED
NOV -8 PM 4:00
FEDERAL ENERGY REGULATORY COMMISSION

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Avista Corporation)
The Bonneville Power Administration)
Idaho Power Company)
The Montana Power Company)
Nevada Power Company)
PacifiCorp)
Portland General Electric Company)
Puget Sound Energy, Inc.)
Sierra Pacific Power Company)

ORIGINAL

Docket No. RT01-35-000

**MOTION TO INTERVENE OF
WELLS RURAL ELECTRIC COMPANY**

Pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, Wells Rural Electric Company ("Wells REC") submits its motion to intervene in the above-captioned docket. In support of its motion, Wells REC states as follows:

I. SERVICE AND COMMUNICATIONS

Service in this proceeding should be made upon and communications should be directed to the following persons:

Clay Fitch, Chief Executive Officer
Tommi Reynolds, Administrative Assistant
Wells Rural Electric Company
P.O. Box 365
Wells, NV 89835
(775) 752-3328
(775) 752-3407 (Facsimile)

Susan N. Kelly
Craig W. Silverstein
Miller, Balis & O'Neil, P.C.
1140 Nineteenth Street, N.W., Suite 700
Washington, D.C. 20036
(202) 296-2960
(202) 296-0166 (Facsimile)
E-mail address: skelly@mbolaw.com
csilverstein@mbolaw.com

001113.0255.1

FILED
NOV 8 2000

Service is also requested upon:^{1/}

Don Angell, P.E.
5883 S. Schooner Pl.
Boise, ID 83716
(208) 426-9796
(208) 426-0811 (facsimile)

II. DESCRIPTION OF WELLS REC

Wells REC is a Nevada non-profit cooperative association and a FERC-jurisdictional public utility^{2/} that provides electricity to over 10,000 square miles of northeastern Nevada and part of Tooele County, Utah. Wells REC purchases power from the Bonneville Power Administration ("BPA"), which delivers this power to Wells REC over the transmission systems of Sierra Pacific Power Company ("Sierra") and Idaho Power Company ("Idaho Power") under General Transfer Agreements ("GTA") between BPA and these transmission providers. Additionally, Wells REC currently has a separate transmission service agreement directly with Sierra for power deliveries at certain discrete points. These transmission agreements are currently on file with the Commission.

With 1,277 miles of line, Wells REC's distribution service territory includes Wells, East and West Wendover and Carlin, as well as many ranching communities and certain mining operations. Currently Wells REC has over 5,000 active accounts, and has a peak demand of approximately 110 megawatts.

As a FERC-jurisdictional public utility, Wells REC made its Order No. 2000 compliance filing on October 16, 2000.^{3/}

¹ Waiver of Rule 203(b)(3) is requested to permit designation of Wells REC's engineering consultant for inclusion on the Commission's official service list.

² *Wells Rural Electric Company*, 90 FERC ¶ 61,013 (2000).

³ See, *Wells Rural Electric Company*, FERC Docket No. RT01-62-000.

III. MOTION TO INTERVENE

On October 23, 2000, Avista Corporation, the Bonneville Power Administration, Idaho Power Company, The Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc. and Sierra Pacific Power Company (collectively, the "Filing Utilities") filed a "Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000." The Filing Utilities state that the filing describes a proposal to form the RTO West, a regional transmission organization, that complies with the requirements of the Commission's Order No. 2000. The Filing Utilities also seek an expedited declaratory order from the Commission that certain aspects of the proposal, including the proposed governance documents and the scope and configuration of RTO West, are in accordance with applicable requirements under Order 2000.

As a FERC-jurisdictional public utility within the footprint of the proposed RTO West and as an entity that relies upon the transmission system of one of the RTO West's proponents, Sierra, Wells REC has a direct and substantial interest in the outcome of this proceeding. Its interests cannot be represented by any other party, and participation in this proceeding will serve the public interest. Wells REC accordingly requests that the Commission permit its intervention in this proceeding, as provided by Rule 214.

Wells REC is currently evaluating the RTO West proposal, and therefore reserves the right to supplement this motion with additional comments and/or by filing a protest pursuant to the Commission's Regulations.

IV. CONCLUSION

Wells REC respectfully requests that the Commission permit it to intervene as a party in this proceeding, with all rights appropriate to that status.

Respectfully submitted,



Susan N. Kelly

Craig W. Silverstein

Miller, Balis & O'Neil, P.C.
1140 Nineteenth Street, N.W.
Suite 700
Washington, DC 20036
202-296-2960
202-296-0166 (fax)

Attorneys for Wells Rural Electric Company

November 8, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 8th day of November, 2000.



Craig W. Silverstein

Miller, Balis & O'Neil, P.C.
1140 Nineteenth Street, N.W.
Suite 700
Washington, D.C. 20036
202-296-2960
202-296-0166 (fax)